Winter Use Draft SEIS Comments
Grand Teton and Yellowstone National Parks
P.O. Box 352
Moose, Wyoming 83002

Dear Superintendent:

I support Alternative 2 that was developed by the Cooperating Agencies, because it would allow snowmobile access to Yellowstone and Grand Teton National Parks and to the John D. Rockefeller Jr. Memorial Parkway on an individual/personal basis. Individual travel by snowmobile provides the best way to experience the magnificent natural features of the Parks in the winter and I do not support any proposal for snowmobiler's access to be only "with guides".

I urge you to eliminate the high use, peak days, which have led to overcrowding on holiday periods. Daily caps and/or a reservation system should be used to spread use out over a mid-December to mid-March winter season.

I support allowing the Environmental Protection Agency (EPA) to set the emissions standards for snowmobiles within the Park. Since EPA is the expert, they should be the agency that establishes the standard rather than the National Park Service. I support a reasonable level at which to regulate the sound of snowmobiles in national parks. Sound regulations should be established through an appropriate process using Society of Automobile Engineers (SAE) test protocols.

I believe the speed limit from West Yellowstone to Old Faithful should be maintained at 35 mph to increase safety on this heavily traveled route. I support the strict enforcement of speed limits, regulations that prohibit off-road travel and restrictions on non-motorized uses in wildlife winter ranges and fragile thermal areas.

I also encourage you to use partnerships with the surrounding communities, counties and states to expand educational opportunities that inform winter visitors regarding Park rules, user ethics, visitor safety and appreciation of the Park resources.

Sincerely,

_____ Signature

SARA A BAXTER Printed Name

1630 TARGHEE PASS HWY Street Address

WEST YELLOWSTONE MT. 59758 City, State, Zip Code

_____ E-Mail Address

To whom it may concern.
The issue of Snowmobiles in Yellowstone & Grand Teton National Parks, is not that the Snowmobiles damage the park, but a problem with politics influencing reality. To start with Yellowstone Park was put in place for the people of the United States and the rest of the world To enjoy. Yellowstone Park is natural in its beauty From natural resources, such as Rivers Forests, Geysers, mud pots, water Falls, As for wildlife the only real creatures that amounted To much was Fish. The mammals that are in the park were driven up From the plains. Bison, Elk, Moose, Antelope, Bear, wolfs, Coyotes, and any other game. In reality this Park has become a unbelievable natural game preserve. This land is designed To protect its resources and be open To the Public. To be seen year round by all people that wish To explore all Seasons. All Public lands are owned by all of us, and should be Kept accessable To Everyone.

(1)

I understand a very small percentage want the Park only avaible To Them. Just Becaus they have lots of money and Time on there hands, The Interior dept should realize That real facts not paid For Fictions should be used To determine the access To the public in our National Parks.

As For the subject at hand, should Snowmobiles be allowed in Yellowstone And Teton Parks. There has been no proof of damage To the Parks or animals solely From The use of Snowmobiles. There has been a lot of Fiction To the so called adverse problems From snowmobiles. FACT is The Montana Dept of Environmental air with Testing equipment located at The West Entrance has never recorded an EPA Violation. Only lies From Radicals have been Told in the news media and in courts, which is prejudgery. I am disgusted by The Park Service using False information To place gas masks on Rangers at The West Entrance, when in FACT all Interior dept employees OR in danger that are located

in many large cities That exceed EPA air standards regularly are not required To wear gas masks. This could be considered discrimination and lack of caring by The Park Service of all There employees.

Snowmobiles are required To drive only on roads That are groomed. Over a snow base That protects The road surface From damaged Snowmobiles are patroled more than any other group and Ticketed more often Than autos, in percentages. People in cars are given more leway For speeding, when There is a larger chance of animals darting out during The Seasons That Autos are allowed in These Parks.

These groups That are buying off politions and perjuring in our courts are among the largest numbers of people distroying The natural environment of our parks.

FACTS The Park Service has Tryed To hide is That Snowmobiles leave no Tracts, no proven negative damage To animals. Since Snowmobiles have been

Allowed To go in the Parks, All Species Have increased in numbers including endanged Species.

The FACT is THAT Rental Snowmobile operators in West Yellowstone have been the only ones THAT have Real concerns on the polution of the Park. They have used gasohol To reduce exsust pollutants and Synthetic oils. Which I would like To say the Park Service has Refused To State at These gas locations in the Park. Does the Park Really want less polution or just To keep out The public who own the park.

I ~~spoke~~ approve The use of green Snowmobiles either 4 stroke or new 2 strokes design. I Feel over a number of years that regulated Snowmobiles should be replaced by green machines, without Reduction of numbers allowed To visit our Parks I am Totally against limiting numbers of Snowmobiles or Forcing people To go into the park with guides only. This is America land of the FREE.

(4)

Snowcoaches have not shown To be The Transportation of choice by The paying public. And until A dependable snowcoach is developed it should not be A recomended Form of Travel.

We Must Take into consideration The Safety of The people. What if A snowcoach accident happens with 10-30 people aboard how will they be rescued. To go To all snowcoach Travel we must have. 1) A hospital able To treat 20-60 people in A emergency. We must have Trained personal To Recover injured people in large numbers in sub zero Temps. Accidents could happen over 50 Miles away From any plowed Road Access. Who will be Responsible For These lives. Who will personly responsible if There is deaths From exposure To The elements or long Time getting them To care. Is The Park Services going To provide These Facilities, etc. Hospital For 20-60 patients. Rescue personal For These large numbers.

(5)

On Snowmobiles accidents usuly only involve 1-4 people and are easley Transported To care services. Also The surrounding Towns can now care For small numbers of injuries. Who will pay For Hospitals and support staff. The Park Service? The Park Service is leaving ~~out~~ their open. To many lawsuits Regarding public safty. If Snowcoach only ruling results From this DEIS I wouldn't want To be in your shoes. Also If Snowcoach only become reality will They be required To have restrooms, handicap access, auxiliy power To support heat in case of ~~an~~ accendent. if not why not?

Anouther Fact is during winter ~~whether~~ weather conditions There are inversions causing any bad air To settle To low spots. Polution From the JET STREAM, geysers, vents, mud pots, all contribute To the air quality in the Park. Tests have shown That Snowcoaches burn more gas per Traveler Than new green snowmobiles.

(6)

I have asked This question at every public meeting i've been To. How did all The public officials and environmentals get To the meeting so Far none have come on mass Transit. They all want there American Freedom of Traveling on There own at There pace. But They want everyone else To go on buses or snowcoaches.

The cost For a Family To see Yellowstone on snowcoaches would be prohibitive To The general public unless costs are partaly Funded by The Park Service. Would you Travel and pay $90 each For your Family To sit next To someone with The Flu, cold, bad breath, Body oodar, or any bad personal Hygine. A Family of 5 would pay Approx. $450 To have This privage if snowcoaches only would be allowed.

All problems That have happened in The past with snowmobiles are directly related To bad management of The Park Service. If laws are enforced problem are Reduced.

(7)

This last winter conditions were improved because off cooperation between the Park Service + WEST Yellowstone. Selective enforcement By Park Rangers under command of Bob Siegbert caused a lot of false press against Snowmobiles in the Park.

FACT. Animals are naturally afraid of people so when bison are on the Road shows they aren't afraid For there safty From Snowmobiles. But they do React To the Size of the snowcoucher Size does matter when it comes To intimating bison.

The worst Abuse of Park animals come in the months when autos are in the park they bring these same radicals who [redacted] chase, get To close To Bear, Elk, Bison, Moose while they have offspring.

On May 5, 2022 AT 10:11 AM North of Norris Junction my wife Debra and I Whitnessed 6 people Trotting after The grizzly Sow with her 2 yearlings, running down the middle of the road 25 FT behind with cameras. These are The same people that want snowmobiles out of the park.

(8)

I have never heard of a Fine being given To an so called environtist. For harassing an endaged species. They Routinly break laws about 100 yd. distance, chasing, Feeding. But Selective Enforcement Stops The Park Rangers From Fineing or Arresting them. But They will gladly Fine A Snowmobiler For getting close To bison

The largest group of people who distroy our parks are The very ones who want the snowmobiles out. They are GYC, Sierra Club, Fund For Animals, Fly Fishing groups. These people all Trample The ground that stops growth of grass and other plants. Cause Forest Fires with uncontrol campfires, Show me A Snowmobiles who caused A Forest Fire? They distroy stream beds, Banks, plants + Trees. Fishermen Brought in whirling disease To The Madison River, Smelts, Bull Trout To Yellowstone lake endangering Endanged East slope Cutthought Trout. Show me A snowmobiler that has caused danger To an endanged species?

(9)

Back country hikers, campers, Fisherman, crosscountry skiers, showshoers all polute the Parks Forests, streams, Rivers, lakes by using the outdoors for public bathrooms. If a snowmobiler would use the side of the road for this he or she would be arrested. They use public restrooms only. The animals that don't want to be by people hide out in the back country not to be disturbed but hikers, Fisherman, skiers, snowshoers ~~fed~~ feel they have the right to harrase these poor animals. If they come across a bear and spook it, they come running to a Ranger and many times the endanged animal is killed because a radical Enviromentists entruded in the home of an endanged species. Snowmobilers do not cause the death of any endaged species. On Sunday May 21, 2002 I reported 20-40 people inside the keep out signs for the nesting bald eagles on the Madison River, no citation were given and no snowmobilers were in sight. A nother example of non snowmobiler abuse of endanged species. Where was Bob Siegbert? Poor management + enforcement of the laws.

(10)

My conclusion is that Public lands + Parks should be accessible to all in many different ways of transportation, as to let people enjoy our National Park at there time frame and freedom of transportation choices.

I feel improved technology of snowmobiles will enhance the experience for all without any limits to numbers. But over a period of 5yrs require increase use of green snowmobiles, and improve quality of snowcoaches, but only if there is a safty factor and Hospital + support structure in place. Unless all members making these decisions will take all social and financial responsebly to the public.

Thank you [signature]

P.S. Feel free to call anytime [signature]

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(11)

COMMENTS ON

Winter Use Plans
Supplemental Draft Environmental Impact Statement
For Yellowstone and
Grand Teton National Parks
And John D. Rockefeller Jr. Memorial Parkway

RECOMMENDATION:

Having studied in detail the DEIS, FEIS, DSEIS, and supporting documentation, much of which the NPS supplied me at my request, I recommend a solution (alternative) that falls between DSEIS Alternatives 2 and 3, as follows:

1. Allow snowmobiles that at minimum meet the emissions standards proposed in Alternative 3. The snowmobile industry is moving that way; by imposing such standards for the parks, the NPS will be "encouraging" them to move even faster.

2. Initially limit the number of such snowmobiles entering each entrance as proposed in Alternative 2. Then over time, if necessary, adjust those limits through adaptive management techniques. Let experience with the new technology snowmobiles play a major role in determining the parks' carrying capacities.

3. Do not require guides to accompany snowmobiles in the parks. They would accomplish nothing significant that can't be done through education and law enforcement.

4. To the extent that a market exists for it, encourage development of a snowcoach based, city bus style (get on where you want, get off where you want), winter mass transit system for the parks that competes with snowmobiles in both convenience and user cost.

SPECIFIC COMMENTS ON THE DSEIS:

Vehicle Engine Emissions

I think the DSEIS makes a good case for banning all vehicles using the engine technologies currently employed in most snowmobiles. I would however suggest that 2 cycle engines as a class not be banned. There would be no reason to ban those that meet the Alternative 3 emissions standards, just as there would be no reason to allow in 4 cycle engines that don't.

Natural Soundscapes - Noise Level Modeling

The modeling of noise levels associated with each of the DSEIS Alternatives was interesting, but seriously flawed. Flawed in the sense that they do not provide a real world comparison of the four Alternatives. There are several problems:

The models for Alternatives 1A and 1B are based on actual expected daily visitation volumes as described for preferred FEIS Alternative G. Traffic volumes for Alternatives 2 and 3 represent the maximum number of snowmobiles allowed through each Entrance, not average daily volumes that would reasonably be expected. As a result, the model shows for Alternatives 2 and 3 even more noise than the current situation, FEIS Alternative A. Not a reasonable outcome, when using quieter snowmobiles with entry limits, unless the model's parameters do not reflect reality.

The model, as described in the March 2001 and January 2002 HMMH Reports makes several other invalid parameter assumptions besides overall vehicle volumes. For example, vehicles allocated to each road segment are assumed to be randomly distributed along it. This is not valid for several reasons.

First, it is known that snowmobiles tend to travel in groups (see *Audibility of Single Events,* DSEIS page 227). The grouping of vehicles impacts noise levels, since two machines in a group are less than twice as noisy as one; and grouping increases the time interval between the noise generators passing any given point. The model does not take this into account.

Second, the model ignores the fact that traffic volumes vary during the day. For example, on DSEIS page 178 under *Traffic Characteristics*, is found about the West Entrance, "…approximately 33.5% of the snowmobiles entered the park during the peak hour [9 to 10 am]". This is another form of grouping that reduces cumulative noise impacts both during the peak and off peak hours.

As anyone who has spent much time at all around the Upper Geyser Basin knows, another form of grouping occurs there (even in the summer). As eruption time for Old Faithful nears, traffic volumes decrease, and then rapidly increase for a short while after the eruption. This post eruption traffic increase even has a name, the Old Faithful Flood. While this traffic volume variation could have been approximated in the model with a 90 minute cycle, it was not.

Finally, the model assumes snowmobiles at all times are traveling at their speed limit, the speed at which they make the most noise. This is not at all realistic. First of all, it's well known that on narrow roads traffic tends to group behind the slowest vehicles. The model does not account for this. If, as the model assumes, snowcoaches travel at 30 mph, how can snowmobiles maintain 35 or 40mph?

The model also does not take into consideration the impact on average speed of Yellowstone's famous bison jams and other distractions, that often bring traffic to a complete halt. To estimate vehicle caused noise levels, the model should have used the average speed actually attained on the various road segments.

Alternative 1B

On page 44 of the DSEIS under *Actions Specific to Yellowstone, Grand Teton and the Parkway* is found the following:

> Beginning in 2004-2005, limit snowcoach visitation to 93,500 (nine year average
> annual oversnow motorized passengers) until capacity is set through adaptive
> management.

That 93,500 figure on snowcoach passenger limits (or any other mention of limiting access via snowcoach) I can find no where else in the document. Is that actually a part of Alternative 1B, or is it an artifact from a prior draft?

Alternative 3

At the bottom of page 55 of the DSEIS under *Table 8. Interim Use Limits Proposed Under Alternative 3* is found the following note:

> 10 See DSEIS Appendix C, letter of Nov 8, 2001. Levels are set to accommodate
> current average daily use except for West Yellowstone, Montana where use is lower
> to provide a starting point to mitigate multiple resource impacts from West
> Yellowstone to Old Faithful resulting from present levels of use. Data indicates
> that use over about 300 snowmobiles causes deterioration of the snow surface on
> some days.

The letter of Nov 8 2001 has nothing to do with interim use limits or snow surface deterioration. Something needs to be corrected there.

On DSEIS page 56 is found the following:

> Recreational snowmobile access allowed in the parks and the Parkway only when
> accompanied by an NPS permitted guide. Guided groups may contain from 3 to 11
> snowmobiles including the guide.

Taken literally, that implies a visitor (who could afford it) could not hire a guide for an individualized trip through the park. Why is the minimum limit three? Why not two, one guide and one visitor? Why not one, both guide and visitor on the same snowmobile?

Wildlife Impacts

My comment here is fairly simple. In neither the FEIS nor the DSEIS are any significant negative impacts to the parks' wildlife documented. The wolves are doing fine; the bears are asleep; the bison and elk herds are increasing or stable; and the swans are more bothered by visitors on foot than by visitors on oversnow vehicles. Oversnow vehicles in the winter seem to cause the wildlife no more stress than wheeled vehicles in the summer. And in the winter, wheeled vehicles kill far more critters than oversnow vehicles. All that is documented in the FEIS and DSEIS. What isn't documented is justification for a snowmobiles based on wildlife impacts.

Unfortunately, the DSEIS then attempts to keep the wildlife impact ban justification alive with statements like the following on page 217 under the heading *The Effects of Implementing Alternative 2 on Wildlife*:

> Although winter recreation within the park has not clearly demonstrated any
> long term adverse consequences to populations, park policies, regulations,
>and Executive Orders clearly state that disturbance to wildlife, regardless of
> population-level effects, is unacceptable in the national parks.

If that's true, why doesn't the DSEIS include actions relative to wheeled vehicles similar to those proposed for snowmobiles (a ban). The negative impacts on wildlife of wheeled vehicles are well documented in both the FEIS and DSEIS; they are greater than those of oversnow vehicles; and those negative impacts by wheeled vehicles are even greater in the summer.

It seems there's double standard, one for wheeled vehicles, and one for snowmobiles.

Winter Visitor Use

The modes of transportation used by Yellowstone's winter visitors are outlined on DSEIS page 131 as follows:

> Winter activity at YNP is composed primarily of visitors on
> snowmobiles(62%), automobiles and bus passengers (29%),
> snowcoach passengers (9%), and cross-country skiers (1%).

These numbers, however, do not show the segregation of those transportation modes. There is almost no oversnow traffic through the North Entrance (9% of the entrance's total), and no wheeled vehicle traffic through the West, East, and South Entrances; the entrances used by nearly all of the park's oversnow traffic. As a result, there is almost no overlap between wheeled and oversnow vehicle traffic.

It is possible to view Yellowstone in the winter as having two distinct parts: the northern part, and the interior part. The northern part is accessed almost exclusively by wheeled vehicles, and the interior part exclusively by oversnow vehicles. Thus, the issues with which the FEIS and DSEIS deal are primarily ones associated with visits to the park's interior.

This is an important distinction; one that conflicts with how the FEIS and DSEIS choose to view the data relating to winter visitor use. For example, on DSEIS page 257:

> The removal of snowmobile access into the park would eliminate
> the current most popular form of winter experience (more than 60%
> of users) resulting in major adverse effects on snowmobile users.

This statement does not reflect the true impact of such a change. North park visitors would be virtually unimpacted, while 90% of visitors to the park's interior would be impacted (see DSEIS page 133). Thus there would be "major adverse effects on" 90% park interior visitors.

Visitor Experience

As I see it, the critical difference between the DSEIS alternatives is transportation mode. On page xi of the DSEIS Summary is found:

> The chief difference among the alternatives is the mode
> of access and the allowable limits by entrance. These
> differences relate more to visitor experience than access.

And on DSEIS page 252:

> The mode of access is a function of visitor preference for
> a certain type of travel experience, unrelated to the
> intrinsic values of the parks.

Implied in these statements is the primary reason 90% of all current visitors to Yellowstone's interior prefer the snowmobile as their mode of transportation, and why DSEIS alternatives 1a, 1b, and 3 will be unsatisfactory from those visitors' point of view. The problem with snowcoach access or guided snowmobile access is that these are guided tours without the visitor having the ability to control the emphasis or timing of the experience.

Control is in the hands of the guide or snowcoach operator. A winter visit to Yellowstone's interior is an expensive adventure. I contend the most potential visitors from this country would find the time spent on tour activities not of interest to them to be a waste of both their time and money. We as a people just don't like to be herded around in groups under the control of others.

The tour mode problem is acknowledged in the DSEIS. For example, on page 255 under Opportunities to View Wildlife:

> However, because visitors riding on snowcoaches travel in
> groups, wildlife viewing would rarely be a solitary or an
> individualized experience and visitors would not experience
> the personal freedom to stop and view wildlife at will. (10)

where (10) (at the bottom of the page) notes:

> It is important to note that impromptu stops by snowcoaches
> to view scenery and wildlife are frequent occurrences under
> current operations and there is no reason to assume that
> this situation would change.

Here the DSEIS documents both the loss of freedom to "stop and view at will" implied by tour mode snowcoach use, and the probability of unscheduled stops for reasons not of interest to the visitor.

Under "Opportunities to View Scenery" (DSEIS page 255) is found a similar acknowledgement to that for wildlife viewing:

> Visitors who find the personal freedom to stop and view scenery,
> at will, essential to their park experience would be adversely
> affected by this [snowcoach only] alternative.

Under "Quiet and Solitude" (DSEIS page 257) is found another such acknowledgement:

> Because of the mass transit requirements, options for solitude
> would be limited for visitors who cannot physically ski or hike.

Similar problems exist with Alternative 3, guided snowmobiles; only the vehicle changes.

The snowcoach and guided snowmobile alternatives would improve some aspects of visitor experience, but only for those visitors willing to part of a tour group. The fact that currently park interior visitors prefer snowmobiles to snowcoaches 9 to 1 signals how unpopular tour mode visits are.

That this is true generally in Yellowstone can be seen in the unpopularity of group tours during the summer (excluding those from other countries). By far the most common comment I hear from first time summer park visitors who have participated in such tours is, "I won't do that again." The same is true of the few first time winter visitors I've worked with who tried snowcoaches.

Public Safety

I mentioned above, under Winter Visitor Use, that while snowmobiles are used by 62% of all winter park visitors, they are used by 90% of park interior visitors. A second example of how the 62% value can present a misleading picture of current park conditions is found on DSEIS page 103:

> YNP compiled a draft report on CIRs involving winter
> recreationists in YNP and outside the park for which
> park rangers' assistance was requested for the period
> December 1995 to March 2001 (Wondrak 1998, rev. 1999,
> 2000, and 2001). The report covered CIRs that related
> to winter recreationists participating in snowmobiling,
> snowcoach riding, skiing, and hiking. Other winter
> recreational activities such as snowboarding, sledding,
> ice skating, and snowshoeing are conducted in YNP during
> the winter, but there were no CIRs associated with these
> activities in the seasons covered by the report. During
> the five [six] winter seasons (1995-2001), about 384 (90%)
> of the CIRs involved snowmobiles (snowmobiles account for
> 62% of overall winter use).

(See also FEIS page 127).

The key point that I think the authors of the DSEIS and FEIS were trying to make is that 90% of CIRs involved snowmobilers, who comprise just 62% of winter visitors. The problem is, as the above makes clear, only CIRs for oversnow activities were included (none for wheeled vehicle related activities); and snowmobiles account for 90% of all oversnow transportation. Just what one would expect if CIRs were transportation mode neutral.

Another problem with the presentation of CIR data under the Public Safety heading is what the majority of CIRs are for. Of the 384 associated with snowmobiles, 222 were visitor assists (gasoline sales, snowmobile repairs, giving directions, etc) and 51 were agency assists (ranger assistance to agencies outside the park). That's 273 CIRs that have little or nothing to do with the safety of park visitors. That leaves a total of 111 CIRs in six years that might involve a public safety issue. Assuming 82 days per winter season, that's about one CIR every four days. I submit that that hardly reflects a significant public safety problem. It does seem to be an attempt to establish "guilt by big numbers".

Next mentioned in the DSEIS (Table 17, page 105) are Emergency Medical Service Reports. This shows that 62% were snowmobile related, the same as the percentage of snowmobile use park wide. However, as with the CIRs, no EMS reports for wheeled vehicles are included.

DSEIS page 105 also covers winter motor vehicle accidents for Yellowstone. It shows that for the 1995-2001 sample period, 65% involved snowmobiles, while 35% involved wheeled vehicles and snowcoaches; almost exactly the percentages by vehicle type park wide. But then the authors throw in:

> In FY 1998, snowmobilers comprised just 2% of the year's
> total visitors, but were involved in 9% of that year's MVAs.

Now what was the purpose of that last statistic if not another attempt at guilt by large numbers? It apparently does not reflect the norm.

What the authors failed to consider (or at least include in either the FEIS or DSEIS) was that MVA rates also depend on the average number of miles traveled by the vehicles in each class. These figures are not provided. Without them, a meaningful comparison of MVA rates between vehicle classes is difficult at best.

This same problem exists with the Citations statistics presented in the DSEIS starting on page 107; where it is noted that in the six seasons from 1995 through 2001 a total of 1581 citations were issued of which 88% were to snowmobiles. Again, vehicle miles per vehicle class data is not provided, making comparisons between the classes questionable.

However, some understanding of the seriousness to the problem relating to citations can be gained from the data provided. Assuming an 82 day season, a little over 3.2 citations a day were issued to all vehicle classes, 88% or 2.8 a day to snowmobiles. Table 76 on DSEIS page 211 and Table 8 on FEIS page 59 indicate that an average of 797 snowmobiles enter the park each winter day (554 West Entrance, 31 North Entrance, 36 East Entrance, and 176 South Entrance).

That means in past years on the average less than four tenths of one percent of snowmobiles entering Yellowstone received citations; less than 3 a day. Not very significant sounding figures. (Innocence by small numbers perhaps).

If my information is correct, both those numbers will be larger for the 2001-2002 season; the result of increased traffic monitoring of the groomed roads by the NPS. A good idea I hope the NPS continues in future years, and which I hope they extend to the plowed roads, including US 191.

End of Comments By

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Please respond to sean-blacklocke

To: <grte_winter_use_seis@nps.gov>
cc:
Subject: Comment

Attached and below is my comment on The Winter Use Plans Final Environmental Impact Statement for the Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr. Memorial Parkway (FEIS) and its March 29, 2002 supplementary document (SEIS). I request documentation of your timely receipt.

May 29, 2002

Winter Use Draft SEIS Comments

Grand Teton and Yellowstone National Parks

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Dear Sirs and Madams:

I respectfully submit the following comments on The Winter Use Plans Final Environmental Impact Statement for the Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr. Memorial Parkway (FEIS) and its March 29, 2002 supplementary document (SEIS). I do so on behalf of suppliers and consumers of snowmobiles and snowmobile services in the Greater Yellowstone Area (GYA). And I do so primarily in an effort encourage the National Park Service (NPS) to develop a new rule to implement new regulations regarding snowmobile use in the GYA, upon completion of its SEIS.

As an environmental consultant, I have encountered a variety of public natural resource

reallocations associated with the National Environmental Policy Act (NEPA) Environmental Impact Statement (EIS) process. To date, I do not believe I have witnessed an agency-proposed redistribution of entitlements that so inordinately burdens a single group of stakeholders. The snowmobile ban proposed in the FEIS and SEIS completely eliminates the historic and accrued use rights of the GYA snowmobile community while extending new entitlements to essentially every other group of stakeholders.

As such, I ask that you consider and subsequently respond to remarks in the three proceeding sections of this comment before rendering and publishing your November 2002 decision.

1. Understanding of the Rationale for the Proposed Snowmobile Ban

2. Critical Analysis of the Rationale for the Proposed Snowmobile Ban

3. Suggestions for Supplemental Analyses

1. Understanding of the Rationale for the Proposed Snowmobile Ban

Presented in defense of the proposed snowmobile ban (Alternative G of the FEIS and Alternatives 1a and 1b of the SEIS) appear to be somewhat distinct legal and economic rationales, both of which obviously incorporate a large body of natural and social scientific findings. For the sake of clarity, before I offer a critical analysis, I review here my understanding of the legal and economic rationales and the general rationale for banning the private use of snowmobiles in the three affected park regions of the GYA.

Understanding of the Legal Rationale

The legal rationale for the proposed snowmobile ban, as presented in the FEIS and SEIS, appears to have been distilled primarily from language in the following statutes, executive orders, regulations, agency policy guidance documents, and case law.

- Administrative Procedures Act
- National Environmental Policy Act
- Organic Act (as amended by the Redwood Act)
- General Authorities Act
- Yellowstone National Park Act
- Grand Teton National Park Act
- John D. Rockefeller, Jr. Memorial Parkway Act
- Clean Air Act
- Endangered Species Act
- Executive Order 11644 Use of Off-Road Vehicles on the Public Lands
- Executive Order 11989 amendments to Executive Order 11644
- 36 CFR 1-2
- 40 CFR 1500-1508
- National Park Service Management Policies 2001
- State of Montana regulations for NAAQS pollutant standards and authorizing statutes
- Fund for Animals et al. v. NPS
- International Snowmobile Manufacturers' Association et al. v. Secretary of the Interior et al.

This body of law relates directly or indirectly to the NPS management of "park resources and values" and the "impairment" of park user benefits such as air quality/visibility, soundscapes, wildlife abundance, water resources, visitor safety, and overall visitor experience.

Specifically, the legal rationale for the proposed ban on snowmobile use in GYA appears to rest heavily on 1) NPS's interpretation of its duty to prevent the impairment of air quality and visibility in the three park regions, and 2) NPS's reference to modeled ambient air quality numeric standards violations due to emissions of CO and HC on peak snowmobile use days under critical atmospheric conditions and where worst-case emission reduction technologies are assumed.

Supporting the air-quality element of the legal rationale to ban snowmobiles are other more subjective references to impairment to park resources. These include bison impairments due to harassment and collision, unreasonable soundscape impairments due to snowmobile noise, and visitor safety impairments resulting from improper snowmobile operation. These "impairments" as legal rationales for banning snowmobiles seem to be presented with a lesser conviction by the NPS, as none are actually supported by any universally accepted or legally mandated numeric standards.

In summary, in support of its proposed snowmobile ban, the NPS claims that the feasibility of the adoption of "clean and quiet" standards for the manufacture and operation of snowmobiles is too uncertain to assure prevention of "impairment" to "park resources and values", particularly with respect to air quality resources.

As Glen Loomis, a West Yellowstone merchant has pointed out, "For this reason, many of the conclusions are driven by jumping from a perceived problem to simply banning snowmobiles. NEPA clearly requires consideration of mitigation of impacts. This should be done before establishing specific limits or banning certain activities."

Understanding of the Economic Rationale

The economic rationale for the proposed snowmobile ban, as presented in the FEIS and SEIS, appears to be supported primarily with references to findings in a selected set of surveys, models, datasets, and studies. The following appear to be key among them.

- "Winter 1998-1999 Visitor Survey Yellowstone National Park, Grand Teton National Park, and the Greater Yellowstone Area"
- "2000-2001 Wyoming Snowmobile Survey" (2001)
- IMPLAN input/output county-level economic impact model (1996)
- Data from NPS on winter visitor records
- Data from NPS, OSHA, and NIOSH on employee health and safety
- "Winter Bison Monitoring" (2001)
- "Technical Report on Noise: Winter Use Plan FEIS" (2001)
- "Review of Research related to the EIS for the Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr. Memorial Parkway" (2000)
- Numerous studies primarily focused on identifying and characterizing adverse effects of snowmobile use on environmental quality and visitor safety

This body of social and natural science directly or indirectly provides an objective foundation whereby determinations of "park resource and value impairments" might be made.

Specifically, the economic rationale for the proposed ban on snowmobile use in GYA appears to have been drawn from 1) foregone benefit estimates associated with natural scientific findings of negative impacts from snowmobile use, 2) limited data of stated preferences for winter uses, and 3) county-level models of economic impacts to the GYA.

Park users for which benefits are forgone due to snowmobile use include those visitors that travel by non-motorized means seeking unaffected soundscapes, wildlife enthusiasts or researchers valuing animals and animal communities devoid of anthropogenic influence, and individuals that are both relatively sensitive to air pollutants and that also visit park areas where snowmobiles congregate. Such restored benefit estimates do not appear to have yet been compared with lost benefits to snowmobile users in any analytical way that might produce a comparative benefit estimate.

In terms of cost estimates, county-level input/output models were utilized to estimate job and revenue losses associated with the snowmobile ban. The economic rationale rests heavily on the NPS estimate that in the 3-state and 5-county Yellowstone area, less than 1% annual job and revenue loss will result from the ban.

The absence of data and analyses available to produce reasonable monetized cost-benefit estimates for alternatives comparison seems somewhat obfuscated in the economic rationale by NPS claims of legal prohibitions of alternatives allowing snowmobile use. NPS does not appear to make claims of "economic efficiency" or "maximum net benefit". Rather, NPS points to its limitations in considering alternatives based on 1) interpreted legal constraints to protect park resources and 2) time restrictions in analyzing and incorporating new information.

Understanding of the General Rationale

In general, NPS presents a rationale for the proposed snowmobile ban that makes no claims about maximizing net benefits in the GYA. NPS essentially presents all of the information it reviewed in proposing its snowmobile ban alternative and identifies the "environmentally-preferred alternative", Alternative G from the FEIS and Alternative 1a from the SEIS. It appears that previous and current snowmobile ban proposals in the absence of legally required cost and benefit data are defended with claims of alternative elimination by *de facto* legal mandate.

It is my understanding, however, that new data regarding the introduction of a newer fleet of "clean and quiet" snowmobiles into the marketplace appears to have successfully challenged this claim. And a full "cost-and-benefit analysis" supporting the NPS's upcoming preferred alternative will accompany its final rule in November 2002.

2. Critical Analysis of the Rationale for the Proposed Snowmobile Ban

The general criticism of the NPS's proposed snowmobile ban offered here is that this redistribution of GYA winter use rights is inordinate and has neither a sound legal or economic foundation.

Critical Analysis of the Legal Rationale

Certain key words, phrases, and concepts common throughout the body of the written law that governs GYA snowmobile use obviously required and will continue to require thoughtful interpretation by the NPS. This is especially true given the NPS's apparent legal authority under its adaptive management policy to reinterpret such words and phrases, subsequent to the NEPA process, as new scientific information surfaces or old analyses are refined.

Critical to determining the federal government's legal obligations and limitations are still open interpretations of such words and phrases as "park resources", "park values", "resource impairments", "unacceptable impacts", "preserve resources", "protect air quality", "sustain enjoyment", "experience enjoyment", "high-quality opportunities", "visitor experience", "unreasonably interfere", "where necessary and inappropriate", "professional judgment", etc. These concepts are obviously highly subjective and dynamic and rarely referenced with universally accepted numeric standards.

Yet plentiful in the public dialogue are claims of *de facto* legal mandates to ban the private use of snowmobiles in GYA based on these subjective and dynamic concepts. For example, there have been claims that certain predicted (not observed) state ambient air quality standards violations render the snowmobile ban the NPS's only legal alternative.

In a letter and attached comments sent to Steven F. Iobst of the NPS from Max H. Dodson of the EPA dated April 23, 2002, the following statement is made. "DSEIS modeling indicates a potential exceedance of National Ambient Air Quality Standards (NAAQS) and Montana Ambient Air Quality Standards (MAAQS) for alternatives 1b, 2, and 3 in the first implementation year." This information appears to be the quantitative cornerstone of the FEIS legal rationale for private snowmobile elimination in GYA. And it continues to be promoted by EPA as a rationale for eliminating the interim snowmobile allowance.

Although the public may not be certain, NPS should be certain that the federal government has no legal authority here under the Clean Air Act nor does the State of Montana have the legal authority to impose emission limits in excess of federal technology standards on vehicles in the absence of demonstrated standards violations. As documented in a March 15, 2002 letter from Howard E. Haines of the Montana Department of Environmental Quality to Bill Howell of West Yellowstone, Montana, "…the Montana Department of Environmental Quality has not monitored any exceedances of National Ambient Air Quality Standards (NAAQS) or the Montana Ambient Air Quality Standards (MAAQS) for carbon monoxide since monitoring began in 1998."

NPS reports that under the snowmobile-banning SEIS Alternative 1, there would be an eventual one-quarter reduction in NAAQS pollutants, while only three-quarters of this cut would occur under snowmobile-limiting SEIS Alternative 2. Statement of this marginal comparison is legally irrelevant. SEIS Alternative 2, and for that matter FEIS Alternative A (the original no-action alternative), do not coincide with federal or state ambient air quality standards violations. Such violations have never been observed.

Clearly, there is no direct or indirect absolute mandate to ban snowmobile use in the three-park area in the interim or in perpetuity.

This is evidenced in the facts that 1) snowmobile use in GYA increased for decades without significant formal contest prior to the 1997 action taken by Fund for Animals et al., 2) the 1997 action resulted in the call for the development of an Environmental Impact Statement (EIS) rather than an injunction, and 3) a Federal Court in Wyoming has ordered the NPS to reevaluate the EIS and reissue the January 2001 Record of Decision (ROD) due to emerging scientific findings regarding future snowmobile emissions.

In this absence of a clear legal mandate to either ban or limit, or for that matter expand snowmobile use in GYA, the ongoing redistribution of user rights in the GYA should be highly contingent on adequate findings of marginal costs and benefits and their allocations. This is consistent with the body of federal law governing this issue. To date, this has not been the case.

Critical Analysis of the Economic Rationale

The economic rationale for the proposed snowmobile ban, as presented in the FEIS and SEIS, appears not to have yet been reconciled with emerging information found in more recent surveys, models, datasets, and studies. The following appear to be key among them.

- "American Voters Views on Snowmobiles in National Parks"
- Oversnow vehicle sound level measurements from the State of Wyoming
- New data on snowcoach emission factors from the State of Wyoming
- New data regarding future snowmobile emissions from snowmobile manufacturers
- New data regarding future snowmobile emissions from Southwest Research Institute
- New data regarding future snowmobile emissions from the State of Montana
- New data regarding fuel consumption and emissions comparisons between the Arctic Cat 4-stroke snowmobile and the Ford 2000 snowcoach from Clyde Seely
- New data showing graphically the excess demand for snowmobile use resulting in proposed daily snowmobile visitor caps from Clyde Seely
- New data on common snowcoach and snowmobile sound levels at the South Gate community from Jackson Hole Scientific Investigations
- New data on economic impacts from the State of Wyoming
- "An Expert Opinion on the Reasonableness of the Cooperating Agencies' Alternative #2 for Inclusion in the Winter Use SEIS" (2001)
- "After-Market Improvement of 2-stroke Snowmobiles"
- "Status and Potential of 2-stroke Technology in Montana"
- "Comparison of CO Emissions from Snowcoaches, 1997 and 2001 Clean Snowmobile Challenge New Technology and Applications"
- "The Electric Snowmobile Demonstration Project"
- "Economic Importance of the Winter Season to Park County"

In reviewing this new body of work, it is obvious that the natural and social scientific information used in this EIS process to date has been inadequate for the purposes of formulating and evaluating competing alternatives. Numerous throughout this process are examples of 1) contradictory and incomplete scientific conclusions, 2) omitted snowmobile-use market observations, and 3) inappropriate economic output model applications.

Recent snowcoach and late-model snowmobile noise and emissions comparison studies offer an excellent example of contradictory scientific conclusions. NPS science predicts per-person pollutant emissions from the emerging class of snowmobiles to be in excess of emissions from snowcoaches. Several recent findings have demonstrated just the opposite.

In an exhibition this year at the third annual Clean Snowmobile Challenge, scientists from Colorado State University demonstrated that a modestly priced adaptation to a conventional snowmobile has the potential to reduce its CO emissions by over 90% and its HC emissions by 89%. According to the Wyoming Snowmobile Survey, more than half of snowmobile owners and renters would be willing to pay a higher price to operate cleaner and quieter snowmobiles. These two pieces of information together clearly demonstrate that NPS conclusions regarding predicted future air quality in the GYA in the absence of a snowmobile ban are erroneous.

In fact, data submitted to NPS by Clyde Seely in a letter dated April 19, 2002 on comparative per-person pollutant emissions between 4-stroke snowmobiles and 2000 Ford van conversion snowcoaches demonstrate that the proposed snowmobile ban and theoretic snowcoach substitution would actually increase total emissions.

Consider this comparative data on the emissions of snowmobiles currently entering the marketplace under market conditions and snowcoaches that by NPS's own admission will only be utilized in GYA if significant public subsidies are provided. Affordable new four-stroke snowmobiles have a demonstrated capability of HC emission reductions in the 70-95 percent range and CO emission reductions in the 60-80 percent range. As demonstrated in the data submitted to NPS by Clyde Seely, 2000 Ford van conversion snowcoaches are predicted to emit

112.5% the pollutants of these market demanded snowmobiles on a per-person basis.

These illustrations and the several others not mentioned here are symptomatic of the major deficiency in this EIS process. Analysts have not made use of the most reliable data available to estimate park user benefits among alternatives. The most recent science and actual market demand as observed through price are essential in providing the best available estimates for comparison of the GYA's potential winter-use benefits. Both remain largely absent in the SEIS.

The SEIS states on page 148, "Alternatives 2 and 3 are particularly complicated by not having survey data on winter visitor opinions and reactions specific to them." I offer that winter visitor opinions about how they value snowmobile and snowcoach opportunities respectively might better be estimated by simply observing the GYA winter use market that currently exists.

Analysts in this process seem almost to find stated preference data more desirable than observed preference data. Should not every opportunity to derive benefit estimates from actual demand be exhausted before resorting to estimates via shadow pricing? Not all winter uses in GYA are non-market values. In fact, most are relatively easily observed market values. Will NPS make use of actual market data that indicate relative winter-use preferences in any future cost-benefit analysis?

Most unsettling in the economic rationale presented by NPS in its proposal to ban snowmobiles in the GYA is its finding that no proposed alternative will have a significant adverse impact on a substantial number of small business.

The best estimate I am aware of has 70 businesses in the four gateway communities wholly or partially dependent on revenues from snowmobile use in GYA. By NPS published estimates, almost 60% of snowmobile users claim they would visit the GYA less frequently if snowmobiles are banned from GYA. NPS's own estimate acknowledges over a $21 million dollar loss of output that would be concentrated in small gateway communities including and especially West Yellowstone, Montana.

The SEIS states, "In the context of the total GYA economy, expenditures by winter park visitors (and the additional economic activity that spending indirectly generates or induces) is a small portion of total GYA annual economic output. The direct, indirect, and induced expenditures generated in the GYA by nonresidents visiting the parks in the winter months are estimated at about $63,000,000. In the context of the $5.7 billion dollar annual output of the 5-county economy, this represents 1.1% of the total (Minnesota IMPLAN group, County-level data 1996)". The SEIS goes on to characterize this economic impact as "insignificant".

NPS's most recent economic impact analysis document states "NPS does not believe any of the entities will be disadvantaged relative to other operators because, within the context of the RFA, almost all operators are small regardless of their size relative to one another, and the costs of this regulation proportional to revenue are expected to remain relatively constant across different size firms."

This is essentially equivalent to concluding that 1) because the economic impacts can be diluted in an analysis by selective delineation of the area of consideration, and 2) because a ban on snowmobiles will eliminate, albeit relatively equally, all snowmobile outfitting enterprises (that by NPS estimates depend on snowmobile rentals for 92% of their winter business), there is "no significant economic impact."

A more careful consideration of the impacts of the proposed snowmobile ban, such as the one done recently by Montana's Bureau of Business and Economic Research, reveals the following about GYA community impacts. "About $33 million of the nonresident expenditures from snowmobiling occur in West Yellowstone. Restricting the number of individuals in Yellowstone Park may result in a decline of non-resident expenditures of between 10 and 15 million dollars. This decline assumes that some of the snowmobilers may be replaced by other winter users. These expenditure estimates translate into losses of between 2 and 4 million dollars in labor income, affecting winter employment opportunities in West Yellowstone; full-time jobs may become part-time and part-time jobs may cease to exist. As many as 150 jobs may be involved if the National Park Service limits snowmobiling in the Park."

Further revelations concerning the significance of economic impacts that threaten the general welfare of the four Yellowstone gateway communities were presented at a January 26, 2002 public meeting convened by the U.S. House of Representatives Committee on Small Business. Testimony included that of snowmobile and snowmobile service suppliers in the east, south, and west Yellowstone gateway communities.

Robert Coe of east-gateway Pahaska TeePee Resort provided testimony stating, "Effects of a snowmobile ban on my business at Pahaska would be catastrophic. Winter season accounts for 30% of our yearly revenue."

Robert Walker of south-gateway Flagg Ranch Resort provided similar testimony. "The limitation and eventual elimination of our contractual authorization to rent snowmobiles will result in a substantial financial loss to Flagg Ranch and will force us to close down during the winter season. We have estimated that this will cause a reduction in our gross revenues of 25%, a reduction in our gross income of 30%, and a reduction in our total net income of 50%."

Most alarming was the testimony of Clyde Seely of west-gateway Yellowstone Tour and Travel. "I currently employ over 220 people, many with families. Our payroll is in excess of $2.5 million dollars… At Three Bear Lodge 52 % of our total annual revenue comes from three winter months. We believe that a ban on snowmobiles would cut our winter revenue by 60-70 percent…." Mr. Seely also testified that based on his estimates of previous business, the proposed 330 visitor per day cap "would (have) equate(d) to an economic loss (to the West Yellowstone community) of between $7 and $8.5 million during each of the years from 1995 to 2001 (not accounting for multiplier effects)."

It is incomprehensible that rational people would characterize these findings of economic impact as "insignificant" rather than "devastating". As I stated in the introduction to this comment, I have never witnessed in an EIS process an agency-proposed redistribution of entitlements that so

inordinately burdens a single group of stakeholders.
Finally, and potentially of legal consequence, NPS has arguably advanced its "environmentally preferred alternative" thus far in the absence of its cost-benefit analysis requirements under the National Environmental Policy Act and Executive Order 12866 Regulatory Planning and Review. Although NPS is not required by either law to select the alternative that "maximizes net benefits", it is required to exhaust every reasonable opportunity to arrive at relative net benefit estimates for each alternative and provide a clear explanation of why, if applicable, it was not selected.

Is this forthcoming, or will the public only have the information from the currently available analyses that compare only two alternatives, ban or severely limit snowmobile use in GYA?

3. Suggestions for Supplemental Analyses

In the event that 1) net benefit estimates of respective FEIS and SEIS alternatives will be generated, and 2) a new comprehensive community-level rather than county-level economic impact study will be conducted as a part of a forthcoming full cost-and-benefit analysis and economic impact analysis, I offer the following suggestions to the NPS for supplementing its current analysis to those ends.

- Estimate benefits of Alternative A from the FEIS along with the alternatives included in the SEIS. Do so with projections of both snowmobile user expansion in the GYA and anticipated snowmobile technological advancements such as those described in the Snowmobile Challenge anecdote presented in section 2 of this comment.

Given recent disclosures regarding the data and analyses utilized prior to this point, and given the dramatic reallocation of GYA winter use entitlements that has resulted from this compromised EIS process, it seems only reasonable that the no-action alternative the starting point in this negotiation process be current snowmobile visitation and technology levels.

- Utilize observed preference data to generate winter user benefits, first. Then supplement with survey data to account for non-market values.

Exclusively querying visitors directly about how they value their tradeoffs between higher impact park recreation and park conservation is unnecessary when observation data are readily available, and it introduces greater inaccuracy.

At fundament issue here is market equilibrium and alleged market diseconomics. Indisputably, in the coarsest terms, maximum net benefits associated with the distribution of winter rights in the GYA are consistent with current snowmobile and non-snowmobile winter-use visitation. The public has already expressed its collective preference for winter use in GYA. It is for high and growing levels of snowmobile use.

Granted, a regulated market such as the market for winter uses in GYA that is being threatened by a coalition of individuals willing to expend resources to alter it politically has alleged measurable spillover effects or externalities. In other words, it is acceptable, albeit disputable, that the NPS intervene in the GYA winter use market that they regulate to attempt to eliminate these diseconomies. It is not, however, acceptable for the NPS to manufacture a regulated-market equilibrium with only survey data and proceed to marginally redistribute user rights in the name of maximizing net benefits and eliminating diseconomics. It is illogical and arguably illegal.

- Conduct an independent comprehensive community-level economic impact study for the four gateway communities.

Given the obvious uselessness of county-level input/output modeling to arrive at an understanding of redistribution resulting from this EIS process, and if as reported, the multiplier utilized in the input/output model is inappropriate in its application to West Yellowstone, such an analysis is clearly in order. As is the case in arriving at estimates in the cost-benefit analysis process, estimates of economic impact must be benchmarked from current market indicators of economic output and employment. Chapters III and IV of the SEIS are filled with speculation about the substitution of snowmobile use by snowcoach visitors, speculation that is seemingly translated into analytic statements about mitigating impact effects. There is no analytical evidence presented that one single current or potential future snowmobile user will ever step foot in a snowcoach in the GYA.

Granted here as well, "some" number of individuals almost certainly will. But it is incumbent on NPS to estimate what number that is in some analytical framework before making such dramatic redistributions among winter-use outfitters' economic entitlements. Truly "insignificant economic impact" is commensurate with current snowmobile visitation. To pursue a policy of redistribution of this magnitude under the unsubstantiated premise of "insignificant" impact is illogical and arguably illegal.

- In summary, consider the distribution of marginal costs and benefits in the issuance of the November 2002 rule if the decision is made to choose among lesser efficient alternatives. And again, before estimating any more marginal cost-benefit or economic impact figures, first return the margin to the more appropriate FEIS Alternative A.

In event that, given all of these considerations, the NPS elects to forego the development of a new rule and that 1) more accurate net benefit estimates of respective FEIS and SEIS alternatives will not be generated, and 2) a new comprehensive community-level rather than county-level economic impact study will not be conducted as a part of a new more comprehensive and competent cost-benefit analysis and economic impact analysis, I offer this observation to the NPS.

A daily use cap of 900 snowmobile visitors, as one proposal under Alternative 2 has it, is a significant compromise in use rights on the part of snowmobile and snowmobile service suppliers and consumers in the GYA.

Best available evidence suggests that concession by the GYA snowmobile community to

relinquish their historic and accrued winter use rights is a move away from maximizing the public's net benefits. Quite simply, I cite current regulated-market conditions and the lack of evidence of diseconomies presented by the NPS. As such, a visitation cap more stringent than 900 visitors is a measure consistent with further diminishing the public's winter use benefits. It too would be illogical and arguably illegal.

I thank you for your time in considering my comments.

Sincerely,

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NPS Comment.tx

Matthew D Burkhart
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05/29/2002 11:02 PM
CST

To: grte_winter_use_scis@nps.gov
cc:
Subject: Winter Use Comments -- NOT A FORM LETTER! PLEASE READ!

May 29, 2002

Winter Use Draft SEIS Comments
Grand Teton and Yellowstone National Parks
PO Box 352
Moose, Wyoming 83012

National Park Service,

I am writing to comment on the Winter Use SEIS for Yellowstone and
Grand Teton National Parks. Overall, I support Alternative 2 as a management method that would best address the uses for which the park was formed and the interests of the American public who own the Parks. I truly think that there never was a "snowmobile problem" until it was invented by anti-recreation and anti-public access groups.

The ability to travel into and through Yellowstone and Grand Teton
Parks on an individual basis is what brings people to the parks. The freedom that a snowmobile offers individuals or small groups makes the snowmobile the predominant and transportation mode of choice for winter visitors. Snowmobilers make up the majority of the winter visitors -- surely that is proof enough that these Parks, which are for the enjoyment of the public, are areas where snowmobile use should be allowed and encouraged. What sense does it make to have a park if the people who are supposed to be enjoying the park are not allowed to do so.

I believe the debate over snowmobiles in Yellowstone has nothing to do with a real problem but rather a political agenda by those groups who believe that National Parks should be natural preserves without people rather than for the enjoyment of the people.

If the mission of the NPS is to provide for the enjoyment of the scenery and wildlife in the parks by the public, banning individual travel by snowmobile does not agree with the mission of the NPS. I have seen no conclusive evidence to show that snowmobile use of these Parks is rendering them "unimpaired for future generations." Our National Parks should be managed for the enjoyment of the people rather than by a lock and key method of management.

I enjoy snowmobiling, as does my family. Yellowstone in the Winter is a fabulous place that more people should enjoy using snowmobile. If we were required to take a snowcoach "tour" of Yellowstone in order to see the park we would forego the trip. We would rather enjoy Yellowstone on our time rather than the tour group's time. We would not and will not visit Yellowstone by snowcoach nor any other mass transit system. We prefer visiting the Parks in the Winter via individual unguided snowmobile rather than enjoying the Parks in the Summer using my personal car. By eliminating snowmobile use from the parks you have defiantly eliminated me and my family as visitors.

Alternative 2 is the best choice for a management plan that provides recreational snowmobile access to the Parks on an individual basis while maintaining the features that make the Parks such a popular destination.

Additionally, I would like to make some comments regarding issues addressed in the SEIS and the supporting documents below:

* Per the SEIS and FEIS, the National Park Service (NPS) seems to promote Mattrack van conversions as the mass transit vehicle of choice over individual use of snowmobiles. I do not feel that the use of "snowcoaches" allows visitors the freedom to see the park at their leisure.

Having been a passenger in a snowcoach I can attest to the fact that it is not a pleasurable experience. The vehicles are cramped, noisy and often lack the climate controls to keep passengers comfortable at a constant temperature or prevent the windows from fogging up, thus impairing visibility out of windows. Additionally, visitors without a window seat often to not get the full view of the scenery.

Snowmobiles allow the visitor to actually travel in a manner where they are surrounded in every direction by the open atmosphere of the Parks. Snowcoaches do little more than shuttle people from one place to another in an uncomfortable manner. I believe that snowcoach use in the Parks should be by personal choice rather than legislated. The park visitor should be able to choose their method of transportation in the winter, the same as they do in the summer. A guide should not be required as proposed in Alternative 3.

Additionally, Mattrack Van Conversions, which the NPS feels are the best available technology, are significantly "dirtier" than the donor van that they are based on and the snowmobiles they are to replace. The NPS is encouraged to use the study completed by the State of Wyoming with respect to snowcoach emissions as the best available science for making management decisions.

* The Environmental Consequences section of the SEIS, as well as other places in the document, the NPS biases the issues by continually referring to the "sound and smell" of snowmobiles with a negative connotation. The SEIS documents imply that snowmobiles sound and any odor are "bad". I do not feel that snowmobile sound from a stock exhaust system is considered noise. Any odor produced by a properly tuned snowmobile is hardly even noticeable. This said, I am opposed to allowing entrance by those snowmobiles with modified exhaust or poorly tuned engines but entrance should be permitted by snowmobiles with stock exhausts and utilizing engine technology that meets the finalized EPA standards for snowmobile emissions.

* The NPS wishes to set the standards for emissions in the Parks. The EPA should be the governing body for emissions requirements in the parks. The EPA has proposed emissions standards for snowmobiles. Those standards should be the basis for snowmobile emissions requirements in the Parks, not a special set of "park regulations".

* The economic and employment impacts of snowmobile tourism in the Parks on surrounding gateway communities, counties and states cannot be ignored. Eliminating snowmobiles from the Parks will spell economic disaster for communities and employers, some who have been in business for generations. In a national economic climate that is less that vibrant, any economic boost and support the NPS can provide to neighboring communities should be encourage. Snowmobiling is a cornerstone of the economies of many communities and should not be eliminated from the Parks.

* The public is generally misinformed about snowmobile use in Yellowstone. Snowmobiles are limited only to 184 miles of designated trails -- not unlimited off-trail travel. Restricting snowmobiles to designated trails in the Parks (with the exception of Jackson Lake for fishing) is appropriate.

* The Environmental Consequences section of the SEIS states that Alternative 2 has 163,711 acres where "noise" can be heard with average background conditions. Of the 2,353,562 acres of land on the three park units this is 6.5% of the area where snowmobile noise can be heard. If the natural "soundscape" of the park is of concern, those visitors who wish to have no sound have 93.5% of the Parks in which to enjoy quiet. There is already enough area for those who enjoy no sound at all.

* Non-motorized users or thermal and wildlife areas should be required to stay on designated trails to minimize impacts to these areas.

* The NPS should use adaptive management techniques to allow management style to change in response to different usage patterns and transportation technologies.

* The non-motorized and snowcoach only access at the beginning of the winter season allows the limited number of visitors who do not wish to even see a snowmobile, let alone ride one, enjoy the park. If this season is popular and has a high usage, a season at the end, possibly April, may be appropriate as well. Snowmobile travel, as outlined in Alternative 2, should be allowed in the mid-December to mid-March time period.

* Education should be used to mitigate problems rather than just eliminating snowmobiles. Individual users, rental shops, states and clubs could be partners in efforts to educate users about proper viewing of wildlife, use of oxygenated or bio-fuels and safety.

* The SEIS claims that 97% of the accidents in the parks involve snowmobiles and just 3% involve snowcoaches. This is due to the fact that snowmobiles are the overwhelming majority of vehicles in the Parks in the Winter. This is not due to the fact that snowmobiles and their operators are inherently dangerous. If only snowcoaches are allowed in the Parks, 100% of the accidents would be due to snowcoaches. Further, there is information to support that Mattrack vans such a poor weight distribution that they cut deep ruts in the roads and create maintenance as well as safety problems.

Thank you for the opportunity to comment on this important issue. The NPS Winter Use website had a good amount of information and was a good resource. Additional planning processes should have similar websites dedicated to the dissemination of information regarding the process.

I trust that the NPS will keep the recreational interests of the people of the United States in mind while selecting a final management plan that has been created and chosen using the best available good science and without bias or influence from anti recreation and anti use groups.

Regards,
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Attached are our comments.

Kim and Joyce Childs
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83402

Yellowstone Snowmachine use Comments

We are seriously concerned about the severe impacts that two-cycle snowmachines have on Yellowstone Park and other parks. We have visited Yellowstone in all seasons for over 40 years. We have visited at least four times per year in the last six years. Now our predominant use is early spring as soon as the roads open and late fall just prior to the roads closing. We visit the park to watch all wildlife and have a special interest in the wolves and grizzlies. We frequently make winter visits using the Mammoth-Cooke City road for access. We hike, snowshoe, and cross country ski in addition to observing wildlife from our car. We avoid the summer months due the serious problems with crowds.

We use our car for transportation and are primarily non-mechanized recreationists. We ski, hike, backpack, mountain bike, raft and kayak. We are in our early fifties and had parents that backpacked, hiked, and skied into their 70's. We are against off-road mechanized recreation because of the environmental damage and wildlife impacts we have personally observed. We strongly support wilderness designations. I have a master's degree in chemical engineering and work at the INEEL in nuclear programs. My wife teaches German, French and Biology at the high school level.

To be able to honestly assess snowcoaches and snowmachines for relative impact and effectiveness for access to the park in winter we have used both on a trial basis. Two years ago we rode a snowcoach for a three day trip to Old Faithful and back to West Yellowstone, plus a loop trip from Old Faithful to West Thumb-Lake-Canyon-Norris-Madison and back to Old Faithful. We were in an old Bombadier type snowcoach. These old snowcoaches are noisy, smell like exhaust (inside and out), and miserable to see out of. They are a poor way to see the park and should be removed from use. The major disadvantage we see with all snowcoaches is that they are inflexible to the desires of the individual passengers. With up to 15 people in these vans there are always going to be many people wanting to stop or go and see or do different things. On our trip we waited repeatedly for one person taking tripod photos and thus did not have enough time to see other sights and wildlife. The modern vans with rubber tracks look like an acceptable way to see the park and avoid most of the disadvantages of the old Bombadier type snowcoaches. Quiet modern snowcoaches should be allowed to continue to serve park visitors. Modified vans to with larger higher windows and better defrost are desirable. Tinted windows are not desirable since they frequently hinder viewing in the low light conditions often encountered in winter. Passengers can wear sunglasses when needed.

During this snowcoach trip we snowshoed in the Old Faithful area for several hours on two different days. Both days we continually heard the annoying whine of snowmachines and smelled their exhaust when over a mile away from the developed area. This is unacceptable and unnecessary.

This past winter we rented two different types of four-stroke snowmachines, one Arctic Cat and one Polaris. This was a three day trip traveling the same route as the previous year. Our neighbors who own new Polaris two-stroke snowmachines were with us. We found the four-stroke machines have more than adequate power to travel the park road system at the speed limits. The four-stroke machines are quieter than the two-stroke machines even though they clearly excessively noisy. Even though we wore insulated visor helmets the noise made our ears rang all night. Based on our experience, the four-stroke machines get about 40% better mileage than the two-stroke machines. The four-stroke machine emissions, based on smell alone, were relatively unnoticeable compared to the two-stroke machines. You had to stand right in the exhaust for it to be offensive, much like a compact car. On the lower loop we followed our neighbors, alternating two and four-stroke machines, with roughly 300 yard spacing. We had moderate cross-winds and snowfall. The two-stroke machine emissions are absolutely nauseating even under these conditions and even if only one is upwind.

The entire town of West Yellowstone, was covered in a blue cloud of exhaust when we started our trip at noon. The noise of hundreds of two-stroke machines in town was deafening. We can't imagine how people can think this is fun and not harmful. The air was clearly polluted far beyond healthy levels. We can now understand why park employees have used respirators.

Snowmachines do, however, afford ideal sightseeing as you travel in the park. You can stop almost anywhere and see in any direction without roof-lines or other people blocking your view. A snowmachine would be an excellent way to access the park, IF AND ONLY IF, THEY ARE QUIET, CLEAN, FOUR-STROKE MACHINES. A snowmachine can make it possible to travel distances that would be prohibitive on skis so that core areas of the park can be accessed. Non-mechanized travel can then be used to get to specific park features that are off the paved road system.

The current four-stroke machines are not quiet enough. Quieter machines are essential for all visitors to experience the park as naturally as possible. Low emissions are essential to protect air quality. Even if air quality is poor only near the roads with existing machines, that is unacceptable because that is where all the people are. Much of the wildlife near the roads is exposed as well. Lower emissions should be a continuing goal for **any** machines allowed in the park and standards should get stricter on a reasonable time scale to allow technology to keep pace.

From our observations the wildlife is accustomed to the snowmachine and car traffic, even at the existing noise and pollution level. As long as snowmachine operators are not reckless, the effects on animals appear no different than cars. You can't argue snowmachines should not be allowed because of wildlife impacts, yet still allow cars, without being grossly inconsistent. Speed limits should be strictly enforced and anyone harassing wildlife should be severely sanctioned. We saw no evidence of irresponsible snowmachine operation on this year's trip and only one instance the previous year.

We have reviewed the supplemental EIS and find it very difficult to draw desired comparative information from it. Even with lengthy study it was difficult to interpret. A large issue in the EIS is the impact to communities. The communities have benefited for years from an activity that was obviously damaging to the park and human health in the communities, yet they did nothing to promote healthy change. Protecting the park should be the priority and the communities have no one to blame but themselves if they suffer. They need to change now to protect the park long term and this will ensure their long term future as well.

Our conclusions from our direct experiences the last two years follow:

1) Requiring guides is absolutely ignorant and unnecessary. Guides should be available to those who would like them, but not be mandatory. People can follow written rules (even inexperienced people) and they can be enforced with adequate funding. **Do not require guides!**
2) The existing two-stroke snowmachines are absolutely unacceptable in the park due to excessive noise and nauseating air pollution. **Two-stroke snowmachines should be banned immediately!**
3) The old Bombadier snowcoaches are excessively noisy air polluters even though they create less per capita than two-stroke snowmachines. They are virtually useless for seeing the park because you can't see out of them. **The old Bombadier snowcoaches should be eliminated immediately!**
4) **Modern rubber tracked vans should be allowed, only on the existing paved road system, as is the current policy.**

5) **State of the art four-stroke snowmachines should be allowed, only on the existing paved road system, *once they are about an order of magnitude quieter than this year's models!*** Increasingly strict emissions, mileage, and noise standards should be applied over a reasonable time frame. One feature nearly all snowmachines lacked was a rack arrangement that allowed you to easily carry adequate overnight and emergency gear plus cross-country skis or snowshoes.
6) Numbers of visitors should not be limited unless unbiased scientific studies show significant impacts on air quality, water quality, wildlife, and the quality of each visitors park experience. Currently summer visitors, in cars primarily, far out number winter visitors so you can't consistently argue winter use should be limited.
7) If visitor numbers become excessive in the future, a shuttle system like the one now used in Zion could be a viable option to personal vehicles during peak periods. We have used the Zion system several times since it's inception and it is excellent. The large very high windows are outstanding.
8) Existing speed limits should be strictly enforced.
9) The park budget should increase immediately by a factor of at least two.
10) The entrance fees to the park are one of the world's greatest bargains. We buy the annual all-park pass every year and feel guilty paying so little for so much.

P.O. Box 967
Rock Springs, WY 82902

May 28, 2002

Planning Office
Grand Teton National Park
P.O. Box 352
Moose, Wyoming 83012

Dear Sir/Madame:

"For the Benefit & Enjoyment of the People".

Sound familiar? Maybe you have seen this written someplace--perhaps it was on the arch at the north entrance to Yellowstone National Park (YNP). This was the reason YNP was established in the first place.

We are writing because we are very interested in the outcome of the Supplemental Environmental Impact Statement (SEIS) for the Winter Use Plan that covers Yellowstone Park, Grand Teton Park, and the Rockefeller Memorial Highway. Our interest stems from the fact that we have been visiting Yellowstone Park every winter since the Winter of 1993-1994. We typically go in by snowcoach from West Yellowstone and stay at Old Faithful. From there we typically go skiing. We have rambled the south and north entrances a few times and have stayed at Mammoth. There are many years when time and money didn't, we also go snowmobiling in Yellowstone. With regard to Grand Teton Park--we typically ski the Jenny Lake Trail at least once a year. Over time, we have skied a few of the other trails in GTNP as well.

We have read the SEIS and find you have expended a great deal of effort to try to enhance the parks for the "benefit" of the people. Unfortunately this effort has trampled the "enjoyment" of the people. How can this be?

If you are a snowmobiler all opportunity for spontaneity has been removed because now you have to plan your trip into the park well in advance. You can no longer decide to check out the park once you are in the area. Moreover, if you choose to drive through the park, you have to adhere to a strict schedule to make sure you can re-enter the park to get back where you started when it is time to go home. All of this assumes, of course, that either Alternative 2 or Alternative 3 is chosen.

If you are a snowcoach rider, the experience is being trampled as well. The social experience of the ride is the selling feature of the snowcoach ride. In all the proposed Alternatives, you are promoting the Mattrack coach. In fact Alternative 3 requires the Mattrack coach. Since the Mattrack coach is simply a four wheel drive highway vehicle with cat tracks inserted in place of tires, the suspension of the vehicle is set up for highway dynamics, not oversnow dynamics. Moreover, the seating arrangement is also set up for highway dynamics.

Ltr: Dickinson to Pln Ofc GTNP
Re: Winter Use SEIS
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This means that everyone is lined up like bowling pins and the ride they get is a lot like riding in a small boat in choppy seas. On top of that there are no roof hatches through which one can take photos. All these things detract from the winter experience.

The traditional Bombardier snowcoach has everyone sitting facing each other. This arrangement promotes social interaction and the sharing of experience. Also these coaches were designed for oversnow travel. Consequently passengers are more likely to get sleepy rather than sick. When the roads are in poor condition a good coach driver can finesse a Bombardier through the moguls and provide a tolerable ride. In the converted highway rigs, everyone is out of luck.

We also notice that in all the alternatives except Alternative 2, you plan to close the road between Flagg Ranch and Coulter Bay. What do you plan to do to make this coach ride interesting? It is already a long boring ride. You say this stretch only adds an hour to the trip. What about when the weather is bad and/or there are coach size drifts or slides and the coaches get stuck or have to go slow? When you are on a snowmobile, you have to consentrate on driving which keeps your mind more active and focussed. Coaches as you have stated travel slow. The seating arrangement on the Mattrack vehicles detracts from social interaction. This route has a dearth of thermal features and consequently animals. There are only so many trees one can look at before te novelty wears off--especially if you are from the eastern United States.

When one goes to YNP time is usually very limited. In the winter, the rate of travel reverts back to what it was at the turn of the last century. This means that the quality of travel within the park becomes a significant part of the experience afforded by the park in winter. Each mode of travel offers a different experience; each of which has benefits and drawbacks that appeal differently to different people.

We realize the experiences we have enjoyed for the last 18 years cannot be sustained as they were without detracting from the "benefit" of the people. However, we believe these experiences can with reasonable compromise be approximated in order to foster the "enjoyment" of the people. Your Alternative 2 does the best job of fostering the continued "enjoyment" of the park by the most number of people. If the general public cannot "enjoy" their park, then what is the "benefit" of the park?

One of our concerns with Alternative 2 is with the limitations in quantity of snowmobilers--particularly from the west entrance. Our observation is that it is the snowmobiler who floods the restaurants, gift shops, warming huts and comprise the majority of overnight guests at Old Faithful. The snowcoach populace is much smaller in comparison and they do not appear to spend as much money. Whether anyone likes it or not, it takes money to supply the infrastructure that allows anyone to "enjoy" the park--particularly in the winter. It would be a real shame if the money flow slows to the point where the winter infrastructure cannot be financed and the park's interior becomes off limits in winter to all but a select few who are fit enough and have enough free time to travel on foot.

Ltr: Dickinson to Pln Ofc GTNP
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So while we are not completely happy with all the fine points of this alternative, we still favor Alternative 2 over the other alternatives put forward in the SEIS for winter use in YNP and GTNP. We urge you to research the options of improving the emissions of the Bombardiers or modifying the converted highway rigs so that the social experience and quality of ride presently afforded by the Bombardier is not lost. We also urge you to add a proviso that allows the number of individually operated oversnow vehicles to be adjusted upward should pollution control technology of these vehicles improve significantly beyond where it is today.

The independent experience of being able to drive one's own machine is just as valuable as the social experience afforded [illegible] in the coach. The folks that enjoy the independent travel experience are only [illegible] the same folks that enjoy the social travel experience. [illegible] belong to [illegible]. So please adjust your [illegible] to permit the visitors of the future the opportunity to enjoy the winter experience [illegible] today as much as possible, [illegible] travel preference. After all...the park was established "For the [illegible] Enjoyment of the people".

Thank-you for affording the opportunity to comment on this Winter Use SEIS. Please keep us informed as this and other winter use issues unfold in both Yellowstone Park and Grand Teton Park.

Sincerely,

Carol Iverson Dickinson

Jerry Dickinson

RECEIVED

MAY 15 2002

May 14, 2002

Suzanne Lewis, Superintendent, Yellowstone National Park

If, as we believe, a fixed number of snowmobiles is unilaterally forced on all parties we all lose, especially the local economies. This number will likely be too low and the transition too fast for local economies to adapt. The National Park Service loses by having no mechanism to gradually lower snowmobile numbers. The local economies lose by having a sudden drop in visitation. Snowmobilers may have the only partial victory, but numbers will be so small as to make access very difficult.

The solution we propose is only a theoretical model, and all numbers are subject to adjustment. In this model snowmobile numbers are reduced on a ratio that is based on a corresponding increase in snowcoach visitation. This will protect local economies by maintaining or increasing visitor numbers. If this solution is adopted all parties can believe there position will succeed. Snowmobilers who believe mass transit will never work start with higher numbers. Environmental groups who believe in mass transit will decrease and/or eliminate snowmobiles quickly if things unfold, as they believe. The National Park Service will have a clean and quiet Yellowstone in either case.

The two parties that will have to work with each other the most, the National Park Service and the Local communities, will have a vested interest in making this solution work. The National Park Service will have to make a new snowcoach a reality and help promote mass transit in Yellowstone. The local business community will have to agree to rent only four-stroke snowmobiles for use in Yellowstone and actively promote mass transit to ensure their own success.

In order for this to work the snowmobile industry will have to certify certain models of snowmobiles at a 75 percent emission reduction as all the companies in the marine industry do on their marine engines. This will be possible once the EPA emissions standard is adopted.

In conclusion, a model similar to this protects the local economy with a safety net regardless of outcome of snowmobile verses snowcoach. The National Park Service's goal of mass transit can be achieved without harming local economies, and the Park's environment will be protected and the visitors experience enhanced.

Douglas Edgerton
P.O 29 W. Yellowstone Mt.

Jerry Johnson
P.O. 405 W. Yellowstone, MT. 59758

Percent of Historic	Total Snowmobiles	Total Snowmobile Visitors	Snowcoach Visitors	Total Visitors
100%	400	500	80	580
90%	360	450	160	610
80%	320	400	300	700
70%	280	350	500	850
50%	200	250	750	1000
30%	120	150	1000	1150
10%	40	50	1250	1300
0%	0	0	1500	1500

Percent of Historic	Total Snowmobiles	Total Snowmobile Visitors	Snowcoach Visitors	Total Visitors
100%	600	750	80	830
90%	540	675	160	835
80%	480	600	300	900
70%	420	525	500	1025
50%	300	375	750	1125
30%	180	225	1000	1225
10%	60	75	1250	1325
0%	0	0	1500	1500

Percent of Historic	Total Snowmobiles	Total Snowmobile Visitors	Snowcoach Visitors	Total Visitors
100%	750	938	80	1018
90%	675	844	160	1004
80%	600	750	300	1050
70%	525	656	500	1156
50%	375	469	750	1219
30%	225	281	1000	1281
10%	75	94	1250	1344
0%	0	0	1500	1500

May 19, 2002

National Park Service
Winter Use SEIS
PO BOX 352
Moose WY 83012

Dear National Park Service:

The Winter Use SEIS of Yellowstone and Grand Teton National Parks is a delicate and fragile subject. Strong feeling from both sides with differing opinions have expressed their concerns. In all honesty, it is a no-win situation. One that I unfortunately feel will drag itself out for years. However, this will not prevent me from expressing my comments on the situation and my choice of an alternative.

Being employed by a concessioner in Yellowstone National Park, I have been able to reach my conclusion after discussing the issue at hand with countless Park employees (NPS and concessions) and Park visitors. The over-riding consensus is that the Yellowstone/Grand Teton winter experience is such an amazing experience. I truly believe that to travel in the Park in the winter is one of the great encounters with winter mother nature. For some folks, it is an experience of a lifetime.

I do agree that changes need to occur. My background and university degree focus on automotive management and repair. I have extensive exposure to emissions and respective impacts on the surrounding air quality. I will not argue the fact that two strokes are a significant polluter compared to its four stroke counter-part. However, pollution statistics from Yellowstone do not take into account the overall emissions/air quality of the whole Yellowstone area during the winter. Unfortunately, the figures commonly provided are taken at high traffic areas at peak travel times like President's day weekend. If emissions testing occurred at lower traffic areas like Hayden Valley at the same time, averages could be utilized. This would even further strengthen the case that current emissions do not exceed the recommend EPA allowance.

These emission figures can be significantly reduced by either the reduction of two strokes or the incorporation of modern technology. While the snowmobile manufacturers have been fairly slow in adapting this technology, they are producing four strokes, which, over time, can meet or exceed 2010 EPA emissions. The strict emissions standards that are enforced on today's modern automobiles did not occur within one production year. Therefore, some patience for this technology to be made dependable and adaptable is to be required.

An analogy is that current federal law prohibits two stroke motorcycles from operating on the street. The main reason two strokes are not permitted on public highways is that they do not meet current federal emission and noise control. For a certain group of riders, two strokes are utilized in off-road applications but even that become more closely scrutinized in the next several years, which is why Yamaha has developed a high performance four-stroke dirt bike. Basically, same power as a two stroke without the usual side effects (noise & higher pollutants). Yamaha has now carried over this concept to snowmobiles and they will join Arctic Cat and Polaris by offering four stroke units. In Yellowstone, one does not need a high performance two stroke to visit the Park. Individuals who rent units are seeking a reliable form of transportation to get from point A to B on their schedule. They want to feel the Park through the openness of a snowmobile, not in an enclosed unit. The Yellowstone experience will not be the same if you are in an enclosed vehicle nor if you are on someone else's schedule.

The original lawsuit focused on the grooming of trails which was an easy corridor for wildlife migration. None of the alternatives suggest the complete closure of the roads, which is the only way to avoid grooming. However, if the complete snowmobile occurs and only snowcoaches are allowed, grooming will have to increase even more. After speaking with several NPS groomers, they agree that grooming will have to increase to compensate for the escalated usage of snowcoaches. Since snowcoaches weigh significantly more, these units have a greater impact on the trails than do snowmobiles. For example, the grooves that are apparent on Interstate highways occur mainly from large trucks, not automobiles. The volume of snowmobiles does have an impact on the trail conditions. However, one cannot overlook the impact that an increase of snowcoaches will have on trail conditions, which could actually cause an increase in grooming. A daily cap on the amount of traffic, both with snowmobiles and snowcoaches, will assist in controlling trail conditions.

Another concern is the stress on animals that snowmobiles cause. The majority of stressors point to loud snowmachines. This could be from a snowcoach or snowmobile. Currently, the two stroke snowmobiles are the loudest and most common. However, the stress of wildlife will diminish with the implementation of quieter units. Snowmobile engines can be made to run as quiet as modern automobiles. An implementation and enforcement of a daily cap will help to minimize contact with wildlife, which will reduce stressful confrontations.

In closing, I would like to see Alternative 2 implemented as the winter use plan. While I feel that none of the options are perfect, this option finds a middle ground with all parties. It will have a minor economic impact on the gateway communities but it will not completely shut them down. They will have to adapt appropriately. I would like to see all rental agencies utilize four stroke units. I am against having a guide service because I feel it would take away from the Yellowstone experience but forcing individuals to not be as adventuresome. They could just rely on the guide and would have to be on the guide/group schedule.

The management of Yellowstone is an ever-revolving challenge. New issues cause us to re-evaluate how things have been down for years. The complete ban of snowmobiles is a decision that could have impacts much deeper than just the winter. If snowmobiles are to be banned, what is to stop the opinion that all modes of transportation, including automobiles are also? That might never happen, but it is almost guaranteed that someone will try it. Yellowstone was created for the benefit and enjoyment of the people. A compromise is necessary to make sure that the 'people' can enjoy what has been set-aside for them. The complete ban of snowmobiles will take away from the experience and unfortunately, that will be lost forever. The experience of seeing Yellowstone on a snowmobile is irreplaceable. Please do not take away an experience of a lifetime for some folks. By choosing Alternative 2, the Park and the experience can be saved for future generations.

Sincerely,
Jeff Guengerich
PO BOX 801
Gardiner, MT 59030
406-848-9496

May 27, 2002

Planning Office
Grand Teton and Yellowstone Natl Parks
PO Box 352
Moose, Wyoming 83012

Gentlemen,

I am writing to comment on your winter use plans for Yellowstone and Grand Teton Parks. In my opinion, non of the options you offer are acceptable. I am surprised that you were able to come up with so few choices and believe this shows your predisposition to discriminate against snow-mobiles.

I have a number of observations and questions as a result of reading your report.

1. What do Chicago toll road operators do to protect their workers at toll booths? They are exposed to hundreds of thousands of cars and fumes daily yet I do not hear of them wearing gas masks. What modifications could you make to entry booth areas to control fumes for workers. I have been told your air intake for the booths is in a very bad location and that moving it would make much cleaner air available to the booths. What about positive air pressure for the booths? What about a system where you give information at the Visitor Center and have some automatic pass system to enter the Parks?

2. West Yellowstone is going to bear the brunt of reduced snowmobile use. I have seen a large amount of investment in that town with new motels and upgraded facilities. It was a seedy little town just a few years ago and the winter season has enabled people to upgrade their businesses. A reduction of even 5 to 10 percent in income can be devestating for a small business, yet I believe I read you expect a 33% reduction. These businesses provide valuable services to the park in that they relieve a lot of pressure on park facilities. Extra rooms and restaurant services enable more people to visit the park which means more revenue to the park. West Yellowstone is probably more dependent on tourism than any of the other gateway communities. You do not have a right to destroy the livlihood of these people in an arbitrary manner.

3. Your own report says that sound levels from snowmobiles and snowcoaches are virtually the same so why are you discriminating against the snowmobiles?

4. Your report indicates that there are a number of advances in technology which will make the snowmobiles cleaner as well as quieter. What is the rush to eliminate them now? It will be very disruptive to local economies and you may have to reverse your decision down the road just a few years.

5. I find it distressing that you would use public opinion polls to make a decision of this nature. I thought you were supposed to use science, not the opinions of people who have no ideas of the complex issues involved.

6. It is also wrong to base you decision purely on the number of pro and con comments. Is this an election? You should be using comments to help get additional thinking and perhaps better solutions to your problems. Public comment may present some fresh new ideas.

7. I see a suggestion to allow an average number of snow-mobiles into the park but this will result in the average number being the highest number possible which will drive down the number of people who can visit the park. Where did this number come from? What will the number be when snowmobile emmissions are reduced? Will more be allowed then? Also, tourist businesses as well as many others depend on a short "high season" to carry them through the rest of the year. By limiting park entrance to average numbers, they are denied ever having a high season.

8. We have enjoyed snowmobiling in the park and find it is an extraordinary way to visit and experience the fresh air, wildlife and thermal features. This is the only place our family snowmobiles. We have taken a snowcoach and it is a very different experience...much like watching a sporting event on TV rather than being there.

9. I notice also that snow coaches are very fuel inefficient, often getting less than 3 miles per gallon. One snow coach is then equal to about eight cars.

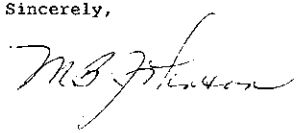
10. What about emmissions from vehicles in the summer? Why are they less objectionable? I know there are many more vehicles in the summer including motor cycles, motor homes, tour buses and trucks. Are you saying that they contribute less than winter vehicles?

11. I am struck by the fact that less than one percent of the park visitors use snowshoes or skis. It seems that your winter plans favor them over the huge majority of visitors who perfer other means of transportation. How is that fair? Also, why are you including cars in your numbers when they cannot visit at the same time as snowmobiles and snow coaches?

12. Your report shows that elk and bison are not bothered much by snowmobiles and cars and that they tend to move away from the road if they are uncomfortable. It also says that the snow shoers and skiers cause them more stress than the vehicles. Also populations are steady or increasing. So what is the fuss about the animals? They are bothered less in the winter when visitor stay on the groomed roadways. In the summer I have seen mobs of people going far off the road to approach buffalo and their calves. I think animals are pursued more in the summer than the winter. People in winter stick to the road and enjoy the animals from the road. The rangers are the ones who come along and herd the buffalo in the winter. I do think it would be helpful to require a little training for park visitor to help them know how to respond when encountering buffalo on the roads. Many people do not know how to respond in this situation.

13. I believe your report does not support limiting snowmobile use in the park. It is good to encourage cleaner and quieter machines but it is wrong to ban them altogether or to limit them to numbers which will not sustain the gateway communities which are vital to the park all year long.

Sincerely,



FRANK B. ODASZ, P.E.
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Mr. Steve Martin, Superintendent
Grand Teton National Park
P.O. Drawer 170
Moose WY 83012

April 7, 2002

Dear Mr. Martin:

The core question implied in the March 29,2002 DSEIS, entitled Winter Use Plans, simply put is:

Is there a place for snowmobiles in Yellowstone Park? As you will see herein the answer is "Yes". Of the alternatives you offer alternative 2 is in the best interest of the owners of the Park - the public.

On one hand, if the Park were to be truly maintained "unimpaired" it would be necessary to ban roads, visitor centers, campgrounds, restrooms, and concessions. Is that the next step for someone's insidious agenda? How long before advocating the future logical extension by clamoring for a ban on all motorized vehicles? Obviously, such simple-minded black and white policy would be contradictory, devoid of good sense, and ridiculously unenforceable.

So, let us examine the arguments against sleds. Start with "ability to disrupt wildlife." Quantify **wintertime** wildlife! Start with the most prevalent: bison. They can be found mainly near the thermals of Mary's Bay and in the Hayden Valley area. Do they panic & run away when sleds come? NO! They plod along & across the road in search of food. Only in winter can you marvel at the utility of those powerful shoulders as they swing the broad head like a clock pendulum clearing snow away from the ground for a bite of grasses. If one blocks your way on the groomed road you STOP, and wait! Snowmobile trails ***help*** bison move to food.

Coyotes: there are some surviving that escaped the wolves. They merely look you over as they continue on their hunt for dinner. Birds: on the open river there might sometimes be a dozen swans and some ducks. The expanse of deep snow between you and the river maintains their tranquility. But you might see an eagle perched in a snag eyeballing them for a dining repast. Now that's disrupting!

Then there is Edgar Allen Poe's mystical favorite - the raven. But rather than be disturbed they seize on the sled as their dinner opportunity. These smart Corves coax have learned have to unfasten the latched pouches behind the sled seats and help themselves to the enclosed lunches. They act fast and are diabolically persistent. It's a fascinating **wintertime** pleasure to watch - even when it's your lunch! How about disturbing the hundreds of bears? No way! They have already been asleep for at least a month and far from the sled paths. What about those recently introduced killing machines - wolves. They are too busy tracking their munchies to the lower elevation elk and livestock feeding grounds.

Emissions from combustion engines. One report says that they are 40 times greater than cars. It would be useful to know the basis: miles per gallon, miles traveled, and hours of operation? Let's take a worst case for the exercise. Omit busses and recreation vehicles. Just look at cars and assume 40:1. If there are 180,000sleds per year times 40 we have 7,200,000 units of emissions for sleds which is 2.5 times greater than the 3,000,000 emission units from cars. An apparent technical solution would be to restrict sleds to those emitting 2.5 times less than the sled used in the 40:1 finding. However, this step is not necessary if planners factor in the clouds of choking summertime dust from the Park's perpetual road construction and add back the bus and RV exhausts. Then it's no contest. Intuition suggests that sleds can easily beat vehicles in the emissions contest when roads, busses, and RV's are included. If the Park leaders are really

objective in this criterion they should not delay an immediate ban on RVs and busses, too. They could use the additional arguments that they block out the view and expel their emissions right into your car's fresh air vent.

If these bans prevail how does the citizen - as one of the many owners of the Park- enjoy it in winter? Consider alternative ways to enjoy the winter wonderland: ski, hike, snow coach, airplane. I have done these. Let me share the experiences.

Try snow coach. They have limited capacity but will get you into the Park if you are willing to put up with being canned in a cold, noisy, jostling, humid container exposed to human off gasses and humidity. The humidity results from the human life-long habit of breathing. Breath moisture condenses on the inside of the coach windows resulting in frequent vigorous wiping of the window, leading to heavier breathing, resulting in....etc. Let me out!

Let's ski in. Beats hiking in the deep snow. Really wonderful, even magical - if you are in great physical condition and, beneficially, if you are a student of avalanches. When I did it I saw a black ink spot moving suddenly ahead of me. Squinting revealed that it was attached to the tail tip of a snow-white ermine somewhat disturbed by my intrusion. I might have disturbed the wildlife. Or did it spook me - all alone in the lodge pole forest? It's an experience best concluded with a hot drink by the fireside sharing close-up encounters.

Let's fly over the winter wonderland! Tremendous panorama! Hard to see game. But it's sad. Sad to see millions of bare, blackened sentinels contrasting the pure white snow as they starkly testify to the infamous "Let it Burn" policy for the 1988 fire. Our children and grandchildren will never see the Park in the glory - summer or winter - as we knew it as a result of that fiasco that destroyed - definitely not "maintained' - half the Park. The "no sled " policy is similarly myopically, mentally misguided.

Some majestically dismiss opposition to the sled ban as anti-environment. I can assure you, from experience, that just one winter trip in Yellowstone will stimulate a deep respect for this especially awesome environment.

The report does make one useful point: there is a limit to the number of sleds per day. But what is the manageable limit. More than 1000, probably, & maybe less than 33,000. But is it zero, none, zilch? Surely we can think of a better policy to enhance environmental pleasure and education - and perhaps gain a little more respect for the Park bureaucracy.

For example, instead of depriving the owners of the Park (we, the people) from memorable winter thrills by plugging for a total ban, consider intelligent compromises:

*Require that the highest emission sources either correct their problem or else be phased out over a reasonable period of time.

*Since noise is correlated with engine speed, enforce the 45-mph speed limit and off-trail excursions vigorously, require effective mufflers, AND have Congress rescind diplomatic immunity for even the most esteemed violators.

*Just as acceptable limits have been established for grizzly bear mortality, set equivalent limits for bison/human accidents in winter and correlate these data with traffic. This starts a scientific way to set reasonable daily traffic limits. Other covariant factors like weather can fine-tune the correlation.

*Provide and designate new trails for skiers away from the groomed roads.

*To further improve an integrated winter experience when avalanches occur announce road closures at points 50-100 miles before the Park entrances so that prospective sledders can adjust plans rather than be turned away at the Park gate.

*When popularity of winter sledding overwhelms current food, fuel, and restroom services then go to an electronic reservation system for a break-even fee.

*But even better, of course, let's expand the facilities to disperse the traffic and it alleged impacts. For example, for a few tens of millions of current dollars, build Snow Lodge equivalents at Canyon, West Thumb, and Fishing Bridge. That way more citizens can better enjoy the pleasure and thrills of their Park as a **winter wonderland** and, correspondingly, impacts are proportionately minimized.

Our world will be a better place as more and more citizens are exposed to Nature's wonders. Banning opportunities for such appreciation stifles creativity and is too typically bureaucratic. It is a mentally lazy copout instead of intelligent management.

Banning sleds from Yellowstone Park (Alternatives 1a &1b) is not an acceptable policy. Alternative 2 is a useful compromise.

Yours truly,

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